

No Further Action Determination Request

Former Automotive Salvage Site
Project Cactus: Silverlake Distribution Warehouse
819 West Silverlake Road and 780 West El Puente Lane
Tucson, Pima County, Arizona

ADEQ VRP Site Code: 513208-00
VRP 19-207

June 12, 2019
Terracon Project No. 63187190



Prepared for:

The Arizona Department of Environmental Quality
Phoenix, Arizona

On Behalf of:

Scannell Properties (dba SPA Properties Tucson, LLC)
Lee's Summit, Missouri

Prepared by:

Terracon Consultants, Inc.
Tucson, Arizona

terracon.com

Terracon

Environmental ■ Facilities ■ Geotechnical ■ Materials

June 12, 2019



The Arizona Department of Environmental Quality (ADEQ)
1110 West Washington Street, Suite 127
Phoenix, AZ 85007

Attn: Ms. Joey Pace, PMP | Project Manager / Hydrogeologist
Voluntary Remediation Program (VRP) | Waste Programs Division
P: (602) 771-4818
E: jp8@azdeq.gov

RE: **No Further Action Determination Request**
Former Automotive Salvage Site (Project Cactus: Silverlake Distribution Warehouse)
819 West Silverlake Road and 780 West El Puente Lane
ADEQ VRP Site Code: 513208-00 | VRP 19-207
Tucson, Pima County, Arizona
Terracon Project No. 65187190

Dear Ms. Pace:

On behalf of Scannell Properties (dba SPA Properties Tucson, LLC), Terracon Consultants, Inc. (Terracon) is requesting that the ADEQ issue a No Further Action (NFA) for select soil areas at the Former Automotive Salvage Site (herein referred to as the site) located at 819 West Silverlake Road and 780 West El Puente Lane in Tucson, Pima County, Arizona. The site location and vicinity are provided in Exhibit 1.

This request is made pursuant to Arizona Revised Statutes (ARS) § 49-181(A) to acquire an NFA determination from the ADEQ. Note that an NFA determination is not being sought for the entire site, but rather in select areas where testing and remediation efforts were completed. Specifically, Scannell Properties is seeking an NFA to address 15 different media-specific areas located within the site boundaries. The NFA determination is being sought for RCRA 8 Metals, select polycyclic aromatic hydrocarbon (PAH) analytes, and select polychlorinated biphenyls (PCB) analytes.

Site Description

The site is comprised of the following three non-contiguous areas:

North Section: 819 West Silverlake Road is comprised of five parcels (APNs 118-11-015G, 118-11-008A, 118-11-007B, 118-11-015N, and 118-11-006C) and covers approximately 6.3 acres.

South Section: 780 West El Puente Lane is comprised of two parcels (APN 118-11-015M and 118-11-016B) and covers approximately 1.5 acres.

Southeast Section: This section has no associated address and is comprised of one parcel (APN 118-11-015L) and covers approximately 1.5 acres.



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The site is located within the Tucson, Arizona Quadrangle at an elevation of approximately 2,380 feet above mean sea level (msl). The site is generally flat and slopes gently towards the west. The 2017 Depth to Groundwater and Groundwater Elevation Map for the Tucson Basin and Avra Valley indicates that groundwater flow in the vicinity of the site is towards the northwest and the estimated first occurrence of groundwater is at a depth of approximately 100 feet below ground surface (bgs).

Background

Phase I Environmental Site Assessment (ESA) (Terracon Project No. 63187151, Revision 1, dated November 9, 2018): Terracon performed a Phase I ESA for the site which identified several recognized environmental conditions primarily based on the history of automotive salvage and metal recycling at the site from approximately 1960 until 2000. At the time the Phase I ESA was conducted, the site was vacant.

Limited Site Investigation (LSI) Report (Terracon Project No. 63187128, Revision 1 dated November 9, 2018): Terracon completed an LSI at the site that revealed concentrations of select RCRA 8 Metals (arsenic cadmium, and lead), PAH analytes, and PCB analytes above applicable State of Arizona residential Soil Remediation Levels (rSRLs) and/or nonresidential Soil Remediation Levels (nSRLs). As such, the Terracon LSI Report recommended excavating impacted soils and removing them from the site for disposal.

Remedial Action Report (Terracon Project No. 63187190, dated February 11, 2019): Subsequently, Terracon performed soil remediation activities (i.e., excavation and removal of impacted soils) at the site to address the elevated concentrations and presented the findings in a Remedial Action Report. Based on the results of the initial site investigation and post-excavation sampling, soils remaining at the site in the remedial areas and select test pits were found to be below applicable ADEQ rSRLs.

As such, this NFA determination request includes the following constituents:

RCRA 8 Metals	Arsenic, Barium, Cadmium, Trivalent Chromium, Hexavalent Chromium, Lead, Mercury, Selenium, and Silver
PAHs	Acenaphthene, Anthracene, Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(k)fluoranthene, Chrysene, Dibenz(a,h)anthracene, Fluoranthene, Fluorene, Indeno(1,2,3-cd) pyrene, Naphthalene, Pyrene, and 2-Chloronaphthalene
PCBs	PCB 1016 and PCB 1254

Inclusion of PCBs in NFA Determination Request

ADEQ's letter to proceed with the NFA process included a statement stating that evidence needed to be provided to ADEQ to demonstrate that the site is not regulated under the US EPA Toxic Substances Control Act (TSCA).

As indicated in the Phase I ESA, LSI, and Remedial Action reports, the site is not currently regulated under TSCA. In the Phase I ESA report, regulatory database information was provided

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by Environmental Data Resources, Inc. (EDR), a contract information services company (Inquiry Number 5418952.2s, dated September 10, 2018). The EDR Report reviewed the following databases in connection with the "Target Property" (The target property is defined as 819 West Silverlake Road Tucson, AZ 85713 and includes the three non-contiguous areas addressed in this request):

- **TSCA:** The TSCA database identifies manufacturers and importers of chemical substances included on the TSCA Chemical Substance Inventory list. It includes data on the production volume of these substances by plant site. The TSCA database listing was last updated on January 5, 2018. The Target Property was not identified on the TSCA database.
- **FTTS:** FIFRA/TSCA tracking system for administrative cases and pesticide enforcement actions and compliance activities related to Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), TSCA, and Emergency Planning and Community Right to Know Act (EPCRA). The FTTS database was last updated on May 11, 2009. The Target Property was not identified on the FTTS database.
- **HIST FTTS:** FIFRA/TSCA Tracking System for Administrative Case Listings. The information in this database was obtained from the National Compliance Database (NCDB). NCDB supports the implementation of the FIFRA and TSCA. The HIST FTTS database was last updated on April 10, 2007. The Target Property was not identified on the HIST FTTS database.
- **SPILLS:** The SPILLS database (also known as the Hazardous Materials Logbook) identified chemical spills and incidents referred to the Emergency Response Unit. The database was last updated on July 24, 2007. The Target Property was not identified on the SPILLS database.
- **SPILLS 90:** The SPILLS 90 database includes those spill and release records available exclusively from FirstSearch databases. Typically, they may include chemical, oil and/or hazardous substance spills recorded after 1990. The database was last updated on February 11, 2013. The Target Property was not identified on the SPILLS 90 database.

As part of the Phase I ESA, a historic review of readily available city directories, historical USGS topographic maps, and selected historical aerial photographs (at approximately 10- to 15- year intervals) was conducted to evaluate land development and obtain information concerning the history of development on and near the site. The Environmental Professional determined:

- Historical city directories and historical aerial photography indicates various auto salvage yard/recycling facilities were operating on the North Section of the site from approximately 1960 until 2000.
- Historical city directories list the west adjacent property as a residential property; however, visual observations made during the site reconnaissance combined with historical aerial photography indicates the property is currently and has historically been used for automotive repair, salvage, and/or storage.

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Terracon's Limited Site Investigation dated November 9, 2018 evaluated the site to determine if historical auto salvage operations on the site and adjoining properties had impacted subsurface soils at the site. As such, Terracon used a tiered analysis sampling approach which included testing soils for total petroleum hydrocarbons (TPHs), volatile organic compounds (VOCs), RCRA 8 Metals, PAHs, and/or PCBs. The inclusion of PCBs in the analysis rationale was due to the history of automotive salvage at the site (which predated 1978, the year that PCBs were banned under federal law), the potential for hydraulic oil-containing operating equipment (e.g., forklifts), and the potential for releases of oils from vehicles that could potentially be PCB-contaminated. The inclusion of PCBs in the analysis rationale was not due to direct evidence of a PCB spill, the presence of below-grade hydraulic lifts, and/or operations that would be expected to regularly use PCBs.

During Terracon's LSI, Terracon encountered slightly elevated concentrations of PCB analytes in the same sample locations where elevated concentrations of arsenic, cadmium, and/or lead were encountered. As such, the primary focus of the remedial actions was to remove soils impacted by metals and not PCBs. As a result of the remedial efforts, residual concentrations of PCBs in these areas were below applicable rSRLs, as required by ADEQ for an NFA determination.

Based on our review of the regulatory databases, historical documentation, results of subsurface sampling, and confirmation sampling analytical data following removal of on-site soils, Terracon has no reason to believe that, per 40 CFR §761.120, a spill containing PCBs at concentrations of 50 parts per million (ppm) or greater occurred onsite or that a spill occurred on site after May 4, 1987. The site is not currently, nor has ever been under the purview of TSCA.

Areas for which an NFA Determination has been Requested

Scannell Properties is not seeking an NFA determination for the entire site, but rather in select areas where testing and/or remediation were completed. Specifically, Scannell Properties is seeking an NFA to address 15 different media-specific areas located within the site boundaries. The NFA determination is being sought for RCRA 8 Metals, select PAH analytes, and select PCB analytes. The media and areas where NFA determinations are being requested are outlined below.

Note that the first table referenced for a specific area denotes the Table Number where a summary of the maximum residual soil concentrations of NFA constituents compared to rSRLs and groundwater protection levels (GPLs) is provided, and the second table reference denotes the Table Number where the NFA Boundary Coordinates or sample point coordinates are provided. All Tables are provided in Appendix B:

Area 1: North Section / RCRA 8 Metals

Request for an NFA determination for the entire North Section for RCRA 8 Metals (arsenic, barium, cadmium, trivalent chromium, hexavalent chromium, lead, mercury, selenium, and silver). A summary of the maximum residual soil concentrations of NFA constituents compared to rSRLs

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and GPLs is provided in Table 1.1, Appendix B. NFA boundary coordinates for this area are provided in Table 1.2, Appendix B.

Areas 2 through 9: North Section / Select PAHs and PCBs

Request for an NFA determination for any PAH or PCB analyte for which a sample was collected and a published rSRL exists. This NFA determination request is specific to the following areas identified in the LSI and Remedial Action Reports:

■ **Areas identified in LSI Report (Areas 2 through 4)**

- Area 2: A 5-foot by 5-foot area around sample location SS-2.2 (Table 2.1 / Table 2.2);
- Area 3: A 5-foot by 5-foot area around sample location SS-3.1 (Table 3.1 / Table 3.2); and,
- Area 4: A 5-foot by 5-foot area around sample location SS-4.1 (Table 4.1 / Table 4.2);

■ **Areas identified in Remedial Action Report (Areas 5 through 9)**

- Area 5: A 5-foot by 5-foot area around sample location NST-1 (Table 5.1 / Table 5.2);
- Area 6: A 5-foot by 5-foot area around sample location NST-2 (Table 6.1 / Table 6.2);
- Area 7: The extents of the area characterized by sample locations CS-22-2, CS-23-3, CS-24-4, CS-25-5 and CS-26-6 (Table 7.1 / Table 7.2);
- Area 8: The extents of the excavation characterized by sample location OWS-1.2 (Table 8.1 / Table 8.2); and,
- Area 9: The extent of the area characterized by connecting sample locations CS-2-1.5, CS-4-1.5, CS-19-1, CS-15-1, CS-16-1, CS-17-1, CS-8-1.5, CS-7-1, CS-6-1, CS-5-1, CS-9-1, CS-10-1, CS-11-1, CS-12-1, CS-13-1, CS-20-1, and CS-21-1 (note sample locations CS-14-1, CS-18-1.5, and CS-3-2 were collected from within the perimeter created by the other listed samples) (Table 9.1 / Table 9.2).

Areas 10 through 15: South and Southeast Sections / RCRA 8 Metals

Request for an NFA determination for RCRA 8 Metals specific to the following areas identified in the LSI Report:

- Area 10: A 5-foot by 5-foot area around sample location 12 (Table 10.1 / Table 10.2);
- Area 11: A 5-foot by 5-foot area around sample location 13 (Table 11.1 / Table 11.2);
- Area 12: A 5-foot by 5-foot area around sample location 14 (Table 12.1 / Table 12.2);
- Area 13: A 5-foot by 5-foot area around sample location 15 (Table 13.1 / Table 13.2);
- Area 14: A 5-foot by 5-foot area around sample location 16 (Table 14.1 / Table 14.2); and
- Area 15: A 5-foot by 5-foot area around sample location 17 (Table 15.1 / Table 15.2).

NFA Determination

On May 21, 2019, the ADEQ issued a letter to Scannell Properties stating that the rationale for requesting the NFA determination was acceptable and to proceed with submitting this NFA application. A description of soil characteristics, per the seven report requirements listed in ARS § 49-181, Paragraph A, begins on the following page.

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June 12, 2019 ■ Terracon Project No. 63187190



1: A.R.S. §49-181(A.1): A description of the specific contaminants for which a no further action determination is being sought.

The specific constituents for which an NFA determination is being sought consists of RCRA 8 Metals, PAHs, and PCBs, depending on area. The request for NFA is based on analytical data collected during Terracon's Limited Site Investigation (conducted October 3, 2018 through October 6, 2018) and subsequent Remedial Action (conducted November 26, 2018 through December 17, 2018).

The boundaries for the NFA Request are provided in Exhibits 2 through 4, Appendix A. Summaries of analytical data to support the NFA determination compared to applicable ADEQ rSRLs and GPLs is provided in Tables 1.1 through 15.1, Appendix B.

2: A.R.S. §49-181(A.2): A description of the actions taken to achieve remediation levels or controls determined in accordance with Section 49-175, subsection B.

During the LSI, Terracon advanced test pits at the site to depths of approximately 5 feet bgs and collected samples at depths of 1 foot, 3 feet, and 5 feet bgs. Select samples were analyzed for RCRA 8 Metals, PAHs, and PCBs.

Areas identified as having RCRA 8 Metal, PAH, or PCB analytes exceeding applicable rSRLs were addressed during Terracon's Remedial Action. Specifically, Terracon over-excavated areas requiring remediation and transferred soils to a stockpile that was placed on 6-mil polyethylene sheeting until which time the impacted soils could be transported off-site and disposed of as special waste. During the over-excavation process, Terracon used a handheld X-Ray Fluorescence (XRF) portable analyzer to screen soils at the excavation boundaries for metal content and made observations to determine if soils continued to appear impacted (i.e., were soils stained, discolored by metal oxidation, odorous, or contain apparent non-native materials). Once, based on XRF screening and visual observations, soils appeared not to be impacted, Terracon collected samples for RCRA 8 Metal, PAH, and PCB analysis from the bottom and sidewalls of the excavation.

3: A.R.S. §49-181(A.3): A description of any soil, water, or soil and water treatment systems used as part of the remediation.

Not Applicable. Remediation was conducted by excavation (i.e., removal and off-site disposal of impacted soils).

4: A.R.S. §49-181(A.4): Whenever institutional or engineering controls are placed on the site.

Not Applicable. No institutional or engineering controls exist or have been proposed at the site.

5: A.R.S. §49-181(A.5): If post-remediation monitoring is proposed, a description of the type of monitoring, monitoring locations, contaminants to be monitored, monitoring frequency and sampling procedures.

Not Applicable. Post-remediation monitoring is not proposed or required.

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6: A.R.S. §49-181(A.6): A description of community involvement activities undertaken to meet the requirements of section 49-176.

The areas for which an NFA determination is being sought are located on the North, South, and Southeast Sections of the site as depicted in Exhibits 2 through 4, Appendix A. The Draft Public Notification is provided as Attachment B, Appendix C for ADEQ VRP's review. Following ADEQ approval, the approved public notification for a NFA determination will be published in the Arizona Daily Star. The public comment period will extend 45 days from the date of the publication.

7: A.R.S. §49-181(A.7): A list of permits under this title obtained for the remedial action or held by the applicant pertaining to the Site.

Not Applicable. Permits were not required for the remedial action. As earthwork was occurring on other parts of the site, the General Contractor was responsible for permits at the site (e.g., dust control permit, stormwater protection plan).

Conclusions and Recommendations

Based on the findings and results of remedial actions at the site, the constituents and areas for which an NFA determination is being sought have been adequately characterized to pursue such a determination. Further, the seven elements of an NFA determination (A.R.S. §49-181[A]) have been fulfilled as described by this letter following satisfactory completion of the public comment period.

Based on the information provided in this letter and Terracon's Limited Site Investigation Report and Remedial Action Report, Scannell Properties respectfully requests an NFA determination for the impacted soil areas as described herein, pending public comment.

Terracon appreciates this opportunity to provide these services to ADEQ on behalf of Scannell Properties. Should you have any questions or require additional information, please contact the undersigned at (520) 798-4847 (Derek K.).

Sincerely,

Terracon Consultants, Inc.

A handwritten signature in blue ink, appearing to read "Derek Koller".

Derek D. Koller, CHMM
Office Manager

Jennifer C. Thies, CEM
Senior Scientist

Dave M. Matson, CHMM
Principal

Brent M. Borchers, P.E.
Senior Principal

Attachments: Appendices A through C

No Further Action Determination Request

Project Cactus: Silverlake Distribution Warehouse ■ Tucson, Arizona

June 12, 2019 ■ Terracon Project No. 63187190



ATTACHMENTS

Appendix A: Exhibits

- 1: Site Location and Vicinity: Topographic Map
- 2: NFA Diagram – North Section
- 3: NFA Diagram – South Section
- 4: NFA Diagram – Southeast Section

Appendix B: Tables

- 1.1 and 1.2: Area 1: List of NFA RCRA 8 Metals and Corresponding NFA Boundary Coordinates
- 2.1 and 2.2: Area 2: List of NFA PAHs and PCBs and Corresponding Sample Location
- 3.1 and 3.2: Area 3: List of NFA PAHs and PCBs and Corresponding Sample Location
- 4.1 and 4.2: Area 4: List of NFA PAHs and PCBs and Corresponding Sample Location
- 5.1 and 5.2: Area 5: List of NFA PAHs and PCBs and Corresponding Sample Location
- 6.1 and 6.2: Area 6: List of NFA PAHs and PCBs and Corresponding Sample Location
- 7.1 and 7.2: Area 7: List of NFA PAHs and PCBs and Corresponding NFA Boundary Coordinates
- 8.1 and 8.2: Area 8: List of NFA PAHs and PCBs and Corresponding Sample Location
- 9.1 and 9.2: Area 9: List of NFA PAHs and PCBs and Corresponding NFA Boundary Coordinates
- 10.1 and 10.2: Area 10: List of NFA RCRA 8 Metals and Corresponding Sample Location
- 11.1 and 11.2: Area 11: List of NFA RCRA 8 Metals and Corresponding Sample Location
- 12.1 and 12.2: Area 12: List of NFA RCRA 8 Metals and Corresponding Sample Location
- 13.1 and 13.2: Area 13: List of NFA RCRA 8 Metals and Corresponding Sample Location
- 14.1 and 14.2: Area 14: List of NFA RCRA 8 Metals and Corresponding Sample Location
- 15.1 and 15.2: Area 15: List of NFA RCRA 8 Metals and Corresponding Sample Location

Appendix C: Additional Documentation

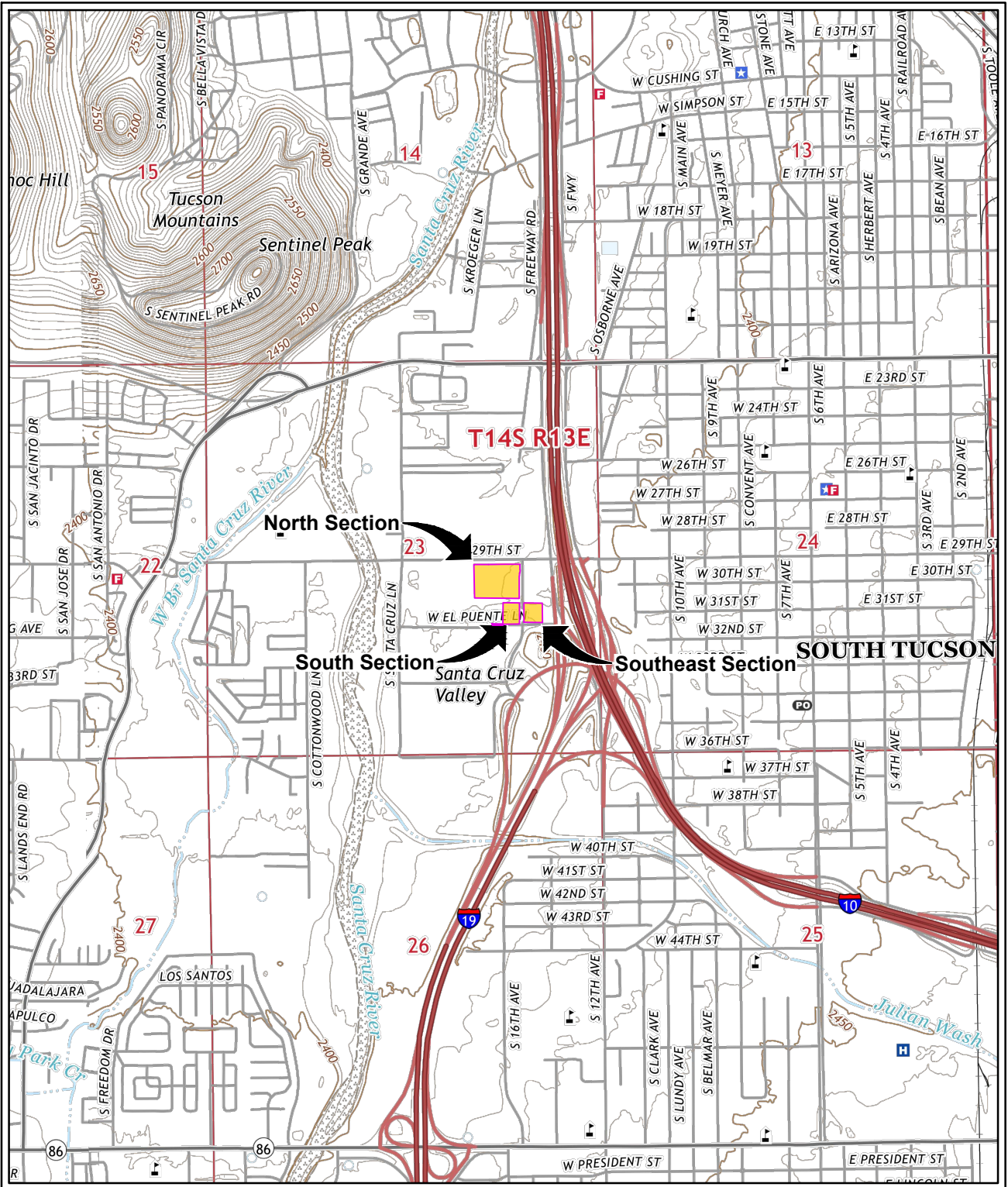
- 1: ADEQ Review Letter
- 2: DRAFT Public Notice

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APPENDIX A

EXHIBITS

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CAT MOUNTAIN, AZ
DATED 2018

TUCSON, AZ
DATED 2018

0 1000' 2000'
APPROXIMATE SCALE



Project Mgr:	DDK
Drawn By:	KLJ
Checked By:	DDK/JT
Approved By:	DMM

Project No.:	63187190
Scale:	as shown
File No.:	63187190_rev
Date:	06/07/2019

Terracon
Consulting Engineers and Scientists
355 South Euclid, Suite 107 Tucson, AZ 85719
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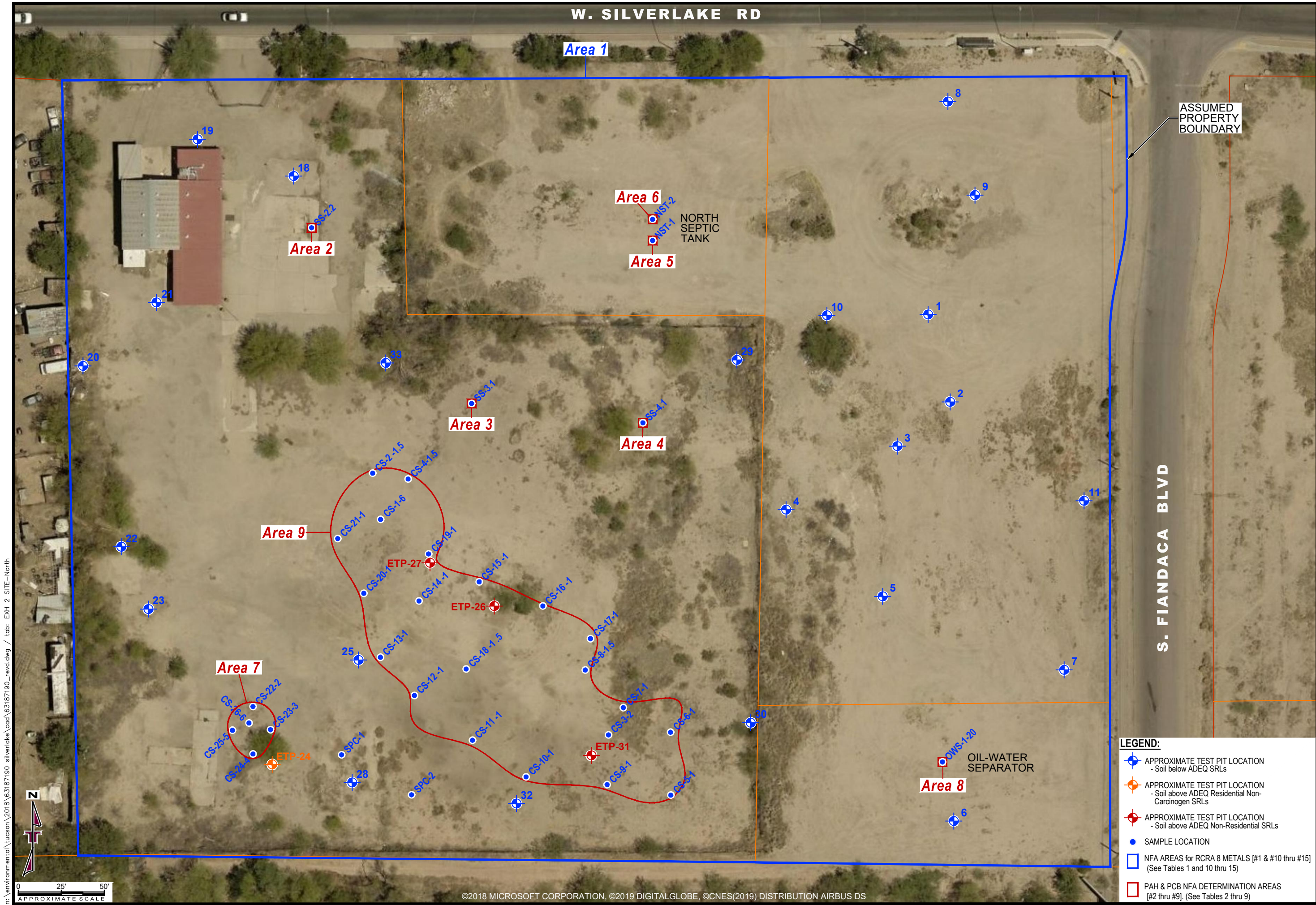
TOPOGRAPHIC MAP
Project Cactus
819 West Silverlake Road and 780 West El Puente Lane
Tucson, Arizona

EXHIBIT
1

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0 25' 50'
APPROXIMATE SCALE

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LEGEND:

- APPROXIMATE TEST PIT LOCATION
- Soil below ADEQ SRLs
- APPROXIMATE TEST PIT LOCATION
- Soil above ADEQ Residential Non-Carcinogen SRLs
- APPROXIMATE TEST PIT LOCATION
- Soil above ADEQ Non-Residential SRLs
- SAMPLE LOCATION
- NFA AREAS for RCRA 8 METALS [#1 & #10 thru #15]
(See Tables 1 and 10 thru 15)
- PAH & PCB NFA DETERMINATION AREAS
[#2 thru #9]. (See Tables 2 thru 9)

Project Mgr: DDK		Project No.: 63187190	
Drawn By: KLJ		Scale: as shown	
Checked By: DDK/JT		File No: 63187190_revd	
Approved By: DMM		Date: 06/10/2019	

EXHIBIT	
2	

NFA DIAGRAM - NORTH SECTION	
Project Cactus	
819 West Silverlake Road and 780 West El Puente Lane	
Tucson, Arizona	

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n:\environmental\tucson\2018\63187190_silverlake\cad\63187190_rev.dwg / tab: EXH 3 SITE - South






Project Mgr:	DDK	Project No.:	63187190	Scale:	as shown	Exhibit	3
	Drawn By:		KLJ				
Checked By:	DDK/JT	File No.:	63187190_rev.dwg	Project Cactus		819 West Silverlake Road and 780 West El Puente Lane	
Approved By:	DMM	Date:	06/07/2019	Tucson, Arizona			

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0 20' 40'

APPROXIMATE SCALE

LEGEND:

	APPROXIMATE TEST PIT LOCATION - Soil below ADEQ SRLs
	NFA AREAS for RCRA 8 METALS [#1 & #10 thru #15] (See Tables 1 and 10 thru 15)
	PAH & PCB NFA DETERMINATION AREAS [#2 thru #9]. (See Tables 2 thru 9)

Project Mngnr:	DDK
Drawn By:	KLJ
Checked By:	DDK/JT
Approved By:	DMM
Project No.:	63187190
Scale:	as shown
File No.	63187190_revld
Date:	06/07/2019

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NFA DIAGRAM - SOUTHEAST SECTION	Project Cactus 819 West Silverlake Road and 780 West El Puente Lane Tucson, Arizona
EXHIBIT	4

EXHIBIT

4

NFA DIAGRAM - SOUTHEAST SECTION

Project Cactus

819 West Silverlake Road and 780 West El Puente Lane
Tucson, Arizona

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Project No.:	63187190
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File No.:	63187190_revd
Date:	06/07/2019

Project Mngr:	DDK
Drawn By:	KLJ
Checked By:	DDK/JT
Approved By:	DMM

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APPENDIX B

TABLES

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APPENDIX B: No Further Action Request Report

Project Cactus: Silverlake Distribution Warehouse ■ Tucson, Arizona

Terracon Project No. 63187190



TABLE 1.1: Area 1 - List of NFA RCRA 8 Metals
North Section

Constituent Name	CAS #	MRSL ^{1,2}	rSRL ^{1,3}	GPL ^{1,4}
Arsenic	7440-38-2	9.95	10	290
Barium	7440-39-3	197	15,000	12,000
Cadmium	7440-43-9	11.2	39	29
Total Chromium	7440-47-3	50.9	NE	590
Trivalent Chromium	16065-83-1	Not Tested	120,000	NE
Hexavalent Chromium	18540-29-9	Not Tested	30	NE
Lead	7439-92-1	191	400	290
Mercury	7487-94-7	0.243	23	12
Selenium	7782-49-2	5.36	390	290
Silver	7440-22-4	1.26	390	290

TABLE 1.2: Area 1 - Corresponding NFA Boundary Coordinates
(Reference Table 1.1 / Exhibit #)

NFA Boundary Corner (<i>Start from NW, then clockwise</i>)	Latitude (N)	Longitude (W)
NW Corner – North Section	32.199347°	110.983045°
NE Corner – North Section	32.199338°	110.981077°
SE Corner – North Section	32.198074°	110.981090°
SW Corner – North Section	32.198109°	110.983032°

KEY: ¹All values listed in milligrams per kilogram (mg/kg)

NE: Not Established

²Maximum Residual Soil Concentration³Residential Soil Remediation Level⁴Groundwater Protection Level

APPENDIX B: No Further Action Request Report

Project Cactus: Silverlake Distribution Warehouse ■ Tucson, Arizona

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TABLE 2.1: Area 2 - List of NFA PAHs and PCBs
Sample Location SS-2.2 (North Section)

Constituent Name	CAS #	MRSL ^{1,2}	rSRL ^{1,3}	GPL ^{1,4}
Acenaphthene	83-32-9	<0.00600	3,700	NE
Anthracene	120-12-7	0.0138	22,000	NE
Benzo(a)anthracene	56-55-3	0.0687	6.9	NE
Benzo(a)pyrene	50-32-8	0.0836	0.69	NE
Benzo(b)fluoranthene	205-99-2	0.102	6.9	NE
Benzo(k)fluoranthene	207-08-9	0.0314	69	NE
Chrysene	218-01-9	0.0638	680	NE
Dibenz(a,h)anthracene	53-70-3	0.011	0.69	NE
Fluoranthene	206-44-0	0.13	2,300	NE
Fluorene	86-73-7	<0.00600	2,700	NE
Indeno(1,2,3-cd) pyrene	193-39-5	0.0509	6.9	NE
Naphthalene	91-20-3	<0.0200	56	NE
Pyrene	129-00-0	0.108	2,300	NE
2-Chloronaphthalene	91-58-7	<0.0200	110	NE
PCB 1016	12674-11-2	<0.0170	3.9	NE
PCB 1254	11097-69-1	<0.0170	1.1	NE

TABLE 2.2: Area 2 - Corresponding Sample Location
(Reference Table 2.1 / Exhibit #)

Sample SS-2.2 Location	Latitude (N)	Longitude (W)
Sample SS-2.2 (Centroid Point) [^]	32.199700°	110.982580°

[^]NFA Boundaries consist of a 5- by 5-foot area surrounding the sample point

KEY: ¹All values listed in milligrams per kilogram (mg/kg)

NE: Not Established

²Maximum Residual Soil Concentration

³Residential Soil Remediation Level

⁴Groundwater Protection Level

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TABLE 3.1: Area 3 - List of NFA PAHs and PCBs
Sample Location SS-3.1 (North Section)

Constituent Name	CAS #	MRSL ^{1,2}	rSRL ^{1,3}	GPL ^{1,4}
Acenaphthene	83-32-9	<0.00600	3,700	NE
Anthracene	120-12-7	<0.00600	22,000	NE
Benzo(a)anthracene	56-55-3	<0.00600	6.9	NE
Benzo(a)pyrene	50-32-8	<0.00600	0.69	NE
Benzo(b)fluoranthene	205-99-2	<0.00600	6.9	NE
Benzo(k)fluoranthene	207-08-9	<0.00600	69	NE
Chrysene	218-01-9	<0.00600	680	NE
Dibenz(a,h)anthracene	53-70-3	<0.00600	0.69	NE
Fluoranthene	206-44-0	<0.00600	2,300	NE
Fluorene	86-73-7	<0.00600	2,700	NE
Indeno(1,2,3-cd) pyrene	193-39-5	<0.00600	6.9	NE
Naphthalene	91-20-3	<0.0200	56	NE
Pyrene	129-00-0	<0.00600	2,300	NE
2-Chloronaphthalene	91-58-7	<0.0200	110	NE
PCB 1016	12674-11-2	<0.0170	3.9	NE
PCB 1254	11097-69-1	0.271	1.1	NE

TABLE 3.2: Area 3 - Corresponding Sample Location
(Reference Table 3.1 / Exhibit #)

Sample SS-3.1 Location	Latitude (N)	Longitude (W)
Sample SS-3.1 (Centroid Point) [^]	32.198820°	110.982280°

[^]NFA Boundaries consist of a 5- by 5-foot area surrounding the sample point

KEY: ¹All values listed in milligrams per kilogram (mg/kg)

NE: Not Established

²Maximum Residual Soil Concentration

³Residential Soil Remediation Level

⁴Groundwater Protection Level

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TABLE 4.1: Area 4 - List of NFA PAHs and PCBs
Sample Location SS-4.1 (North Section)

Constituent Name	CAS #	MRSL ^{1,2}	rSRL ^{1,3}	GPL ^{1,4}
Acenaphthene	83-32-9	<0.00600	3,700	NE
Anthracene	120-12-7	<0.00600	22,000	NE
Benzo(a)anthracene	56-55-3	<0.00600	6.9	NE
Benzo(a)pyrene	50-32-8	<0.00600	0.69	NE
Benzo(b)fluoranthene	205-99-2	<0.00600	6.9	NE
Benzo(k)fluoranthene	207-08-9	<0.00600	69	NE
Chrysene	218-01-9	<0.00600	680	NE
Dibenz(a,h)anthracene	53-70-3	<0.00600	0.69	NE
Fluoranthene	206-44-0	<0.00600	2,300	NE
Fluorene	86-73-7	<0.00600	2,700	NE
Indeno(1,2,3-cd) pyrene	193-39-5	<0.00600	6.9	NE
Naphthalene	91-20-3	<0.0200	56	NE
Pyrene	129-00-0	<0.00600	2,300	NE
2-Chloronaphthalene	91-58-7	<0.0200	110	NE
PCB 1016	12674-11-2	<0.0170	3.9	NE
PCB 1254	11097-69-1	<0.0170	1.1	NE

TABLE 4.2: Area 4 - Corresponding Sample Location
(Reference Table 4.1 / Exhibit #)

Sample SS-4.1 Location	Latitude (N)	Longitude (W)
Sample SS-4.1 (Centroid Point)^	32.198790°	110.981960°

^NFA Boundaries consist of a 5- by 5-foot area surrounding the sample point

KEY: ¹All values listed in milligrams per kilogram (mg/kg)

NE: Not Established

²Maximum Residual Soil Concentration

³Residential Soil Remediation Level

⁴Groundwater Protection Level

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TABLE 5.1: Area 5 - List of NFA PAHs and PCBs
Sample Location NST-1 (North Section)

Constituent Name	CAS #	MRSL ^{1,2}	rSRL ^{1,3}	GPL ^{1,4}
Acenaphthene	83-32-9	<0.00600	3,700	NE
Anthracene	120-12-7	<0.00600	22,000	NE
Benzo(a)anthracene	56-55-3	<0.00600	6.9	NE
Benzo(a)pyrene	50-32-8	<0.00600	0.69	NE
Benzo(b)fluoranthene	205-99-2	<0.00600	6.9	NE
Benzo(k)fluoranthene	207-08-9	<0.00600	69	NE
Chrysene	218-01-9	<0.00600	680	NE
Dibenz(a,h)anthracene	53-70-3	<0.00600	0.69	NE
Fluoranthene	206-44-0	<0.00600	2,300	NE
Fluorene	86-73-7	<0.00600	2,700	NE
Indeno(1,2,3-cd) pyrene	193-39-5	<0.00600	6.9	NE
Naphthalene	91-20-3	<0.0200	56	NE
Pyrene	129-00-0	<0.00600	2,300	NE
2-Chloronaphthalene	91-58-7	<0.0200	110	NE
PCB 1016	12674-11-2	<0.0170	3.9	NE
PCB 1254	11097-69-1	<0.0170	1.1	NE

TABLE 5.2: Area 5 - Corresponding Sample Location
(Reference Table 5.1 / Exhibit #)

Sample NST-1 Location	Latitude (N)	Longitude (W)
Sample NST-1 (Centroid Point)^	32.199080°	110.981940°

^NFA Boundaries consist of a 5- by 5-foot area surrounding the sample point

KEY: ¹All values listed in milligrams per kilogram (mg/kg)

NE: Not Established

²Maximum Residual Soil Concentration

³Residential Soil Remediation Level

⁴Groundwater Protection Level

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TABLE 6.1: Area 6 - List of NFA PAHs and PCBs
Sample Location NST-2 (North Section)

Constituent Name	CAS #	MRSL ^{1,2}	rSRL ^{1,3}	GPL ^{1,4}
Acenaphthene	83-32-9	<0.00600	3,700	NE
Anthracene	120-12-7	<0.00600	22,000	NE
Benzo(a)anthracene	56-55-3	<0.00600	6.9	NE
Benzo(a)pyrene	50-32-8	<0.00600	0.69	NE
Benzo(b)fluoranthene	205-99-2	<0.00600	6.9	NE
Benzo(k)fluoranthene	207-08-9	<0.00600	69	NE
Chrysene	218-01-9	<0.00600	680	NE
Dibenz(a,h)anthracene	53-70-3	<0.00600	0.69	NE
Fluoranthene	206-44-0	<0.00600	2,300	NE
Fluorene	86-73-7	<0.00600	2,700	NE
Indeno(1,2,3-cd) pyrene	193-39-5	<0.00600	6.9	NE
Naphthalene	91-20-3	<0.0200	56	NE
Pyrene	129-00-0	<0.00600	2,300	NE
2-Chloronaphthalene	91-58-7	<0.0200	110	NE
PCB 1016	12674-11-2	<0.0170	3.9	NE
PCB 1254	11097-69-1	<0.0170	1.1	NE

TABLE 6.2: Area 6 - Corresponding Sample Location
(Reference Table 6.1 / Exhibit #)

Sample NST-2 Location	Latitude (N)	Longitude (W)
Sample NST-2 (Centroid Point)^	32.199115°	110.981941°

^NFA Boundaries consist of a 5- by 5-foot area surrounding the sample point

KEY: ¹All values listed in milligrams per kilogram (mg/kg)

NE: Not Established

²Maximum Residual Soil Concentration

³Residential Soil Remediation Level

⁴Groundwater Protection Level

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**TABLE 7.1: Area 7 - List of NFA PAHs and PCBs****Extent of Area Characterized by Sample Locations****CS-22-2, CS-23-3, CS-24-4, CS-25-5 and CS-26-6****(North Section)**

Constituent Name	CAS #	MRSL ^{1,2}	rSRL ^{1,3}	GPL ^{1,4}
Acenaphthene	83-32-9	<0.00600	3,700	NE
Anthracene	120-12-7	<0.00600	22,000	NE
Benzo(a)anthracene	56-55-3	<0.00600	6.9	NE
Benzo(a)pyrene	50-32-8	<0.00600	0.69	NE
Benzo(b)fluoranthene	205-99-2	<0.00600	6.9	NE
Benzo(k)fluoranthene	207-08-9	<0.00600	69	NE
Chrysene	218-01-9	<0.00600	680	NE
Dibenz(a,h)anthracene	53-70-3	<0.00600	0.69	NE
Fluoranthene	206-44-0	<0.00600	2,300	NE
Fluorene	86-73-7	<0.00600	2,700	NE
Indeno(1,2,3-cd) pyrene	193-39-5	<0.00600	6.9	NE
Naphthalene	91-20-3	<0.0200	56	NE
Pyrene	129-00-0	<0.00600	2,300	NE
2-Chloronaphthalene	91-58-7	<0.0200	110	NE
PCB 1016	12674-11-2	<0.0170	3.9	NE
PCB 1254	11097-69-1	<0.0170	1.1	NE

TABLE 7.2: Area 7 - Corresponding Sample Location**(Reference Table 7.1 / Exhibit #)**

NFA Boundary Corner (Start from NW, then clockwise)	Latitude (N)	Longitude (W)
Test Pit ETP-24 (Centroid Point) [^]	32.1983°	110.9827°

[^]NFA Boundaries consist of a 5- by 5-foot area surrounding the sample point**KEY:** ¹All values listed in milligrams per kilogram (mg/kg)

NE: Not Established

²Maximum Residual Soil Concentration³Residential Soil Remediation Level⁴Groundwater Protection Level

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TABLE 8.1: Area 8 - List of NFA PAHs and PCBs
Extent of Excavation Characterized by Sample Location OWS-1 (North Section)

Constituent Name	CAS #	MRSL ^{1,2}	rSRL ^{1,3}	GPL ^{1,4}
Acenaphthene	83-32-9	<0.00600	3,700	NE
Anthracene	120-12-7	<0.00600	22,000	NE
Benzo(a)anthracene	56-55-3	<0.00600	6.9	NE
Benzo(a)pyrene	50-32-8	<0.00600	0.69	NE
Benzo(b)fluoranthene	205-99-2	0.00877	6.9	NE
Benzo(k)fluoranthene	207-08-9	<0.00600	69	NE
Chrysene	218-01-9	0.00698	680	NE
Dibenz(a,h)anthracene	53-70-3	<0.00600	0.69	NE
Fluoranthene	206-44-0	0.00952	2,300	NE
Fluorene	86-73-7	<0.00600	2,700	NE
Indeno(1,2,3-cd) pyrene	193-39-5	<0.00600	6.9	NE
Naphthalene	91-20-3	<0.0200	56	NE
Pyrene	129-00-0	0.00876	2,300	NE
2-Chloronaphthalene	91-58-7	<0.0200	110	NE
PCB 1016	12674-11-2	<0.0170	3.9	NE
PCB 1254	11097-69-1	<0.0170	1.1	NE

TABLE 8.2: Area 8 - Corresponding Sample Location
(Reference Table 8.1 / Exhibit #)

Sample OWS-1 Location	Latitude (N)	Longitude (W)
Sample OWS-1 (Centroid Point) [^]	32.198260°	110.981420°

[^]NFA Boundaries consist of a 5- by 5-foot area surrounding the sample point

KEY: ¹All values listed in milligrams per kilogram (mg/kg)

NE: Not Established

²Maximum Residual Soil Concentration

³Residential Soil Remediation Level

⁴Groundwater Protection Level

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**TABLE 9.1: Area 9 - List of NFA PAHs and PCBs****Extent of Area Characterized by Sample Locations****CS-2-1.5, CS-4-1.5, CS-19-1, CS-15-1, CS-16-1, CS-17-1, CS-8-1.5, CS-7-1, CS-6-1, CS-5-1,****CS-9-1, CS-10-1, CS-11-1, CS-12-1, CS-13-1, CS-20-1, and CS-21-1****(North Section)**

Constituent Name	CAS #	MRSL^{1,2}	rSRL^{1,3}	GPL^{1,4}
Acenaphthene	83-32-9	0.0065	3,700	NE
Anthracene	120-12-7	0.0201	22,000	NE
Benzo(a)anthracene	56-55-3	0.176	6.9	NE
Benzo(a)pyrene	50-32-8	0.223	0.69	NE
Benzo(b)fluoranthene	205-99-2	0.296	6.9	NE
Benzo(k)fluoranthene	207-08-9	0.0839	69	NE
Chrysene	218-01-9	0.207	680	NE
Dibenz(a,h)anthracene	53-70-3	0.0217	0.69	NE
Fluoranthene	206-44-0	0.244	2,300	NE
Fluorene	86-73-7	<0.00600	2,700	NE
Indeno(1,2,3-cd) pyrene	193-39-5	0.146	6.9	NE
Naphthalene	91-20-3	0.029	56	NE
Pyrene	129-00-0	0.211	2,300	NE
2-Chloronaphthalene	91-58-7	<0.0200	110	NE
PCB 1016	12674-11-2	<0.0170	3.9	NE
PCB 1254	11097-69-1	0.281	1.1	NE

KEY: ¹All values listed in milligrams per kilogram (mg/kg)

NE: Not Established

²Maximum Residual Soil Concentration³Residential Soil Remediation Level⁴Groundwater Protection Level

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TABLE 9.2: Area 9 - Corresponding NFA Boundary Coordinates
 (Reference Table 9.1 / Exhibit #)

NFA Boundary Corner (<i>Start from NW, then clockwise</i>)	Latitude (N)	Longitude (W)
CS-2-1.5	32.198715°	110.98247°
CS-4-1.5	32.19870°	110.98240°
CS-19-1	32.19858°	110.98236°
CS-15-1	32.19853°	110.98226°
CS-16-1	32.19850°	110.98215°
CS-17-1	32.19845°	110.98206°
CS-8-1.5	32.19840°	110.98207°
CS-7-1	32.19834°	110.98200°
CS-6-1	32.19830°	110.98191°
CS-5-1	32.19820°	110.98191°
CS-9-1	32.19822°	110.98203°
CS-10-1	32.19823°	110.98218°
CS-11-1	32.19829°	110.98228°
CS-12-1	32.19836°	110.98239°
CS-13-1	32.19842°	110.98245°
CS-20-1	32.19852°	110.98248°
CS-21-1	32.19859°	110.98262°

KEY: ¹All values listed in milligrams per kilogram (mg/kg)

NE: Not Established

²Maximum Residual Soil Concentration³Residential Soil Remediation Level⁴Groundwater Protection Level

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TABLE 10.1: Area 10 - List of NFA RCRA 8 Metals
Sample Location 12 (Southeast Section)

Constituent Name	CAS #	MRSL ^{1,2}	rSRL ^{1,3}	GPL ^{1,4}
Arsenic	7440-38-2	2.7	10	290
Barium	7440-39-3	35.8	15,000	12,000
Cadmium	7440-43-9	<0.200	39	29
Total Chromium	7440-47-3	3.04	NE	590
Trivalent Chromium	16065-83-1	Not Tested	120,000	NE
Hexavalent Chromium	18540-29-9	Not Tested	30	NE
Lead	7439-92-1	2.43	400	290
Mercury	7487-94-7	<0.0200	23	12
Selenium	7782-49-2	<2.00	390	290
Silver	7440-22-4	<0.500	390	290

TABLE 10.2: Area 10 - Corresponding Sample Location
(Reference Table 10.1 / Exhibit #)

Sample 12 Location	Latitude (N)	Longitude (W)
Test Pit ETP-12 (Centroid Point)^	32.1978°	110.9803°

^NFA Boundaries consist of a 5- by 5-foot area surrounding the sample point

KEY: ¹All values listed in milligrams per kilogram (mg/kg)

NE: Not Established

²Maximum Residual Soil Concentration³Residential Soil Remediation Level⁴Groundwater Protection Level

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TABLE 11.1: Area 11 - List of NFA RCRA 8 Metals
Sample Location 13 (Southeast Section)

Constituent Name	CAS #	MRSL ^{1,2}	rSRL ^{1,3}	GPL ^{1,4}
Arsenic	7440-38-2	3.69	10	290
Barium	7440-39-3	36.7	15,000	12,000
Cadmium	7440-43-9	<0.200	39	29
Total Chromium	7440-47-3	4.52	NE	590
Trivalent Chromium	16065-83-1	Not Tested	120,000	NE
Hexavalent Chromium	18540-29-9	Not Tested	30	NE
Lead	7439-92-1	5.43	400	290
Mercury	7487-94-7	<0.0200	23	12
Selenium	7782-49-2	<2.00	390	290
Silver	7440-22-4	<0.500	390	290

TABLE 11.2: Area 11 - Corresponding Sample Location
(Reference Table 11.1 / Exhibit #)

Sample 13 Location	Latitude (N)	Longitude (W)
Test Pit ETP-13 (Centroid Point)^	32.1978°	110.9805°

^NFA Boundaries consist of a 5- by 5-foot area surrounding the sample point

KEY: ¹All values listed in milligrams per kilogram (mg/kg)

NE: Not Established

²Maximum Residual Soil Concentration

³Residential Soil Remediation Level

⁴Groundwater Protection Level

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TABLE 12.1: Area 12 - List of NFA RCRA 8 Metals
Sample Location 14 (Southeast Section)

Constituent Name	CAS #	MRSL ^{1,2}	rSRL ^{1,3}	GPL ^{1,4}
Arsenic	7440-38-2	4.59	10	290
Barium	7440-39-3	47	15,000	12,000
Cadmium	7440-43-9	<0.200	39	29
Total Chromium	7440-47-3	6.82	NE	590
Trivalent Chromium	16065-83-1	Not Tested	120,000	NE
Hexavalent Chromium	18540-29-9	Not Tested	30	NE
Lead	7439-92-1	5.49	400	290
Mercury	7487-94-7	<0.0200	23	12
Selenium	7782-49-2	<2.00	390	290
Silver	7440-22-4	<0.500	390	290

TABLE 12.2: Area 12 - Corresponding Sample Location
(Reference Table 12.1 / Exhibit #)

Sample 14 Location	Latitude (N)	Longitude (W)
Test Pit ETP-14 (Centroid Point)^	32.1977°	110.9809°

^NFA Boundaries consist of a 5- by 5-foot area surrounding the sample point

KEY: ¹All values listed in milligrams per kilogram (mg/kg)

NE: Not Established

²Maximum Residual Soil Concentration

³Residential Soil Remediation Level

⁴Groundwater Protection Level

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TABLE 13.1: Area 13 - List of NFA RCRA 8 Metals
Sample Location 15 (South Section)

Constituent Name	CAS #	MRSL ^{1,2}	rSRL ^{1,3}	GPL ^{1,4}
Arsenic	7440-38-2	3.61	10	290
Barium	7440-39-3	86.7	15,000	12,000
Cadmium	7440-43-9	<0.200	39	29
Total Chromium	7440-47-3	10.1	NE	590
Trivalent Chromium	16065-83-1	Not Tested	120,000	NE
Hexavalent Chromium	18540-29-9	Not Tested	30	NE
Lead	7439-92-1	9.1	400	290
Mercury	7487-94-7	<0.0200	23	12
Selenium	7782-49-2	<2.00	390	290
Silver	7440-22-4	<0.500	390	290

TABLE 13.2: Area 13 - Corresponding Sample Location
(Reference Table 13.1 / Exhibit #)

Sample 15 Location	Latitude (N)	Longitude (W)
Test Pit ETP-15 (Centroid Point)^	32.1976°	110.9818°

^NFA Boundaries consist of a 5- by 5-foot area surrounding the sample point

KEY: ¹All values listed in milligrams per kilogram (mg/kg)

NE: Not Established

²Maximum Residual Soil Concentration

³Residential Soil Remediation Level

⁴Groundwater Protection Level

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TABLE 14.1: Area 14 - List of NFA RCRA 8 Metals
Sample Location 16 (South Section)

Constituent Name	CAS #	MRSL ^{1,2}	rSRL ^{1,3}	GPL ^{1,4}
Arsenic	7440-38-2	3.74	10	290
Barium	7440-39-3	71.9	15,000	12,000
Cadmium	7440-43-9	0.5	39	29
Total Chromium	7440-47-3	8	NE	590
Trivalent Chromium	16065-83-1	Not Tested	120,000	NE
Hexavalent Chromium	18540-29-9	Not Tested	30	NE
Lead	7439-92-1	42.8	400	290
Mercury	7487-94-7	0.0657	23	12
Selenium	7782-49-2	<2.00	390	290
Silver	7440-22-4	<0.500	390	290

TABLE 14.2: Area 14 - Corresponding Sample Location
(Reference Table 14.1 / Exhibit #)

Sample 16 Location	Latitude (N)	Longitude (W)
Test Pit ETP-16 (Centroid Point) [^]	32.1974 ^o	110.9813 ^o

[^]NFA Boundaries consist of a 5- by 5-foot area surrounding the sample point**KEY:** ¹All values listed in milligrams per kilogram (mg/kg)

NE: Not Established

²Maximum Residual Soil Concentration³Residential Soil Remediation Level⁴Groundwater Protection Level

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TABLE 15.1: Area 15 - List of NFA RCRA 8 Metals
Sample Location 17 (South Section)

Constituent Name	CAS #	MRSL ^{1,2}	rSRL ^{1,3}	GPL ^{1,4}
Arsenic	7440-38-2	2.25	10	290
Barium	7440-39-3	23.3	15,000	12,000
Cadmium	7440-43-9	<0.200	39	29
Total Chromium	7440-47-3	4.31	NE	590
Trivalent Chromium	16065-83-1	Not Tested	120,000	NE
Hexavalent Chromium	18540-29-9	Not Tested	30	NE
Lead	7439-92-1	2.3	400	290
Mercury	7487-94-7	<0.0200	23	12
Selenium	7782-49-2	<2.00	390	290
Silver	7440-22-4	<0.500	390	290

TABLE 15.2: Area 15 - Corresponding Sample Location
(Reference Table 15.1 / Exhibit #)

Sample 17 Location	Latitude (N)	Longitude (W)
Test Pit ETP-17 (Centroid Point) [^]	32.1978°	110.9812°

[^]NFA Boundaries consist of a 5- by 5-foot area surrounding the sample point

KEY: ¹All values listed in milligrams per kilogram (mg/kg)

NE: Not Established

²Maximum Residual Soil Concentration

³Residential Soil Remediation Level

⁴Groundwater Protection Level

APPENDIX C

ADDITIONAL DOCUMENTATION

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Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

Sent Via Email

May 21, 2019
VRP 19-207

Mr. Marc Pfleging
SPA Properties Tucson, LLC
801 River Crossing Blvd, Suite 300
Indianapolis, IN 46240

**Re: Review of *Limited Site Investigation* and *Remedial Action Report*
and permission to proceed with No Further Action request**
Silverlake Distribution Warehouse
819 W. Silverlake Road
Tucson, AZ 85713
Site Code: 513208-00

Dear Mr. Pfleging:

The Arizona Department of Environmental Quality Voluntary Remediation Program (VRP) has completed its review of the November 9, 2018 *Limited Site Investigation* and the February 11, 2019 *Remedial Action Report*, both prepared for SPA Properties Tucson, LLC (Scannell) by Terracon Consultants, Inc. (Terracon) prior to entry into the VRP. These documents were both submitted to the VRP with the application for the Silverlake Distribution Warehouse (the Site). The Site was accepted into the VRP on April 8, 2019 and a subsequent kick-off meeting was held on April 26, 2019. Prior to the kick-off meeting, the VRP conducted a cursory review of the reports, and once project end-goals were established in the meeting, it was determined these reports may document sufficient information to support a No Further Action (NFA) request. As such, the VRP completed a thorough review of the documents and has determined Scannell has completed sufficient characterization to receive **approval to proceed with an NFA Report for the following:**

1. A request for an NFA for RCRA 8 metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver) for the entire area referred to as the "North Section" in the reports. Although total chromium does not have a residential soil remediation level (rSRL), when comparing the total chromium results to the more conservative hexavalent chromium rSRL of 30 milligrams per kilogram (mg/kg), all concentrations remaining at the Site are below the rSRL. The total chromium concentrations which exceeded the rSRL prior to remedial action, located in Test Pit 26, 27, and 31, were removed during excavation activities and are confirmed with post-excavation confirmation samples. The groundwater protection level (GPL) for total chromium is 590 mg/kg. In the NFA request, chromium must be referenced as hexavalent chromium and trivalent chromium.

Main Office

1110 West Washington Street • Phoenix, AZ 85007
(602) 771-2300

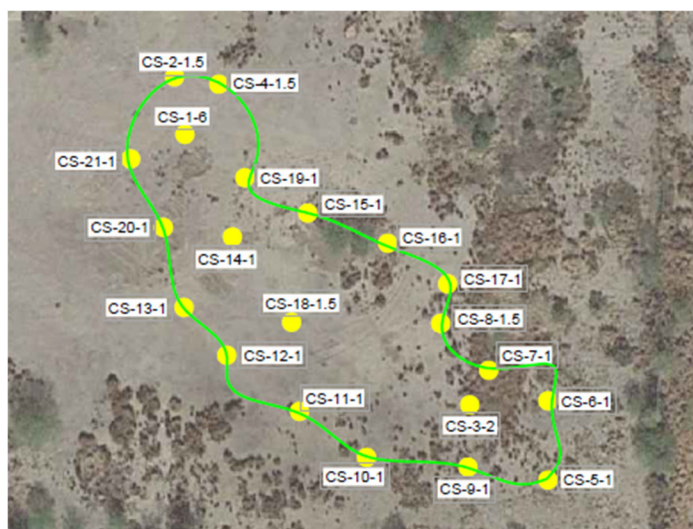
Southern Regional Office

400 West Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733

www.azdeq.gov

printed on recycled paper

2. A request for an NFA for any polynuclear aromatic hydrocarbon (PAH) or semi-volatile organic hydrocarbon (SVOC) for which a sample was collected and a published rSRL exists, in the areas specifically identified in the “North Section”, as follows:
- a. A 5-foot by 5-foot area around sample location SS-2.2;
 - b. A 5-foot by 5-foot area around sample location SS-3.1;
 - c. A 5-foot by 5-foot area around sample location SS-4.1;
 - d. A 5-foot by 5-foot area around sample locations NST-1 and NST-2;
 - e. The extents of the area characterized by sample locations CS-22-2, CS-23-3, CS-24-4, CS-25-5 and CS-26-6.
 - f. The extents of the excavation characterized by sample location OWS-1.2; and
 - g. The area created by connecting the sample locations outlined in green, below.



3. A request for NFA for RCRA 8 metals in the areas specifically identified in the “South Section” and “Southeast Section” as follows:
- a. A 5-foot by 5-foot area around sample location 12;
 - b. A 5-foot by 5-foot area around sample location 13;
 - c. A 5-foot by 5-foot area around sample location 14;
 - d. A 5-foot by 5-foot area around sample location 15;
 - e. A 5-foot by 5-foot area around sample location 16; and
 - f. A 5-foot by 5-foot area around sample location 17.

Please note, although the areas defined in Item #2, above, also meet the rSRLs for polychlorinated biphenyls (PCBs) when compared to the rSRL for high-risk mixture PCBs (the default SRL when only aroclors are sampled), the VRP cannot issue permission to proceed with a request for NFA for PCBs until Scannell provides evidence the Site is not regulated under the Toxic Substances Control Act (TSCA). Pursuant to Arizona Administrative Code Title 18 Chapter 7, a Volunteer must illustrate a site is not regulated under TSCA as prescribed in the Code of Federal Regulations (CFR), specifically 40 CFR 761.120 *et seq.* If the Volunteer cannot provide this evidence, ADEQ has no regulatory

authority to issue an NFA for PCBs. However, if the Volunteer can provide this evidence, the Site areas described in Item #2, above, may also include a request for NFA for PCBs.

How to Proceed

Scannell should submit the following information in an NFA Report:

1. A summary that adequately addresses the seven requirements listed in Arizona Revised Statutes (A.R.S.) § 49-181(A). All seven requirements must be addressed in writing. If a component is not applicable to the Site, state “not applicable” for that statutory requirement.
2. A general site location map underlain by a topographic base layer.
3. A scaled map of the **NFA boundary areas** (clearly defined and labeled). The NFA will only be applicable for the areas of the Site for which the characterization was completed. In a separate map, Scannell may include the NFA boundary with labeling that illustrates the supporting characterization data for any area included in the NFA.
4. A digital NFA boundary map. Instructions for preparing the digital submittal are located on the ADEQ VRP website.
5. A list of the contaminants for which the NFA is sought. Only contaminants for which characterization has been completed may be included. The list shall be presented in a table, with a column illustrating the applicable residential SRL and, if established, the default GPL.
6. If appropriate and desired as part of the NFA, the necessary documentation to show the Site is not under the purview of TSCA.
7. A draft NFA Public Notice and the name of the newspaper where the notice will be published.

Upon receipt of the NFA Report:

- The VRP will review the NFA Report pursuant to A.R.S 49-181(B).
- The VRP will review the draft NFA Public Notice and will either provide comment or approval for publication.
- Once the draft NFA Public Notice has been approved by the VRP, it must appear for at least **one day in a daily local newspaper of general circulation, or for two days in weekly newspaper of general circulation.** The public will have 30 days to provide written comments to Scannell and/or ADEQ. The VRP must be notified of the day(s) of publication, and must be provided with an Affidavit of Publication.
- Upon completion of the 30-day public comment period, the Volunteer must provide the VRP with a *Public Comment Notification Letter* and the original, copy of a signed *Certification for No Further Action Form* (located on the ADEQ VRP website). The certification form must be signed by the Volunteer of Record (Marc Pfleging of SPA Properties Tucson, LLC).
- Once all of the required documentation is received by the VRP, the documents will be reviewed and if no modifications are required, the VRP will issue an NFA for the investigated soils.

If you have any questions, please contact me by electronic mail at jp8@azdeq.gov or by telephone at (602) 771-4818.

Regards,

A handwritten signature in black ink that reads "Joey Pace". The script is cursive and fluid.

Joey Pace, Project Manager
Voluntary Remediation Program

cc: John Neill - Scannell Properties – *sent via email*
Derek Koller - Terracon Consultants. Inc. – *sent via email*
Jennifer Thies - Terracon Consultants. Inc. – *sent via email*

**NOTICE OF 45-DAY PUBLIC COMMENT PERIOD
FORMER AUTOMOTIVE SALVAGE SITE
VOLUNTARY REMEDIATION PROGRAM SITE
REQUEST FOR NO FURTHER ACTION DETERMINATION**

Pursuant to Arizona Revised Statute §49-181(A), Scannell Properties (dba SPA Properties Tucson, LLC) is requesting a No Further Action (NFA) determination from the Arizona Department of Environmental Quality (ADEQ) for portions of the property located at 819 West Silverlake Road and 780 West El Puente Lane (the Site) in Tucson, Arizona. The Site is comprised of the following three non-contiguous areas: The **North Section**: 819 West Silverlake Road is comprised of five parcels (APNs 118-11-015G, 118-11-008A, 118-11-007B, 118-11-015N, and 118-11-006C) and covers approximately 6.3-acres; The **South Section**: 780 West El Puente Lane is comprised of two parcels (APN 118-11-015M and 118-11-016B) and covers approximately 1.5-acres; and, the **Southeast Section**: This section has no associated address and is comprised of one parcel (APN 118-11-015L) and covers approximately 1.5-acres. The Site is currently managed under the ADEQ Voluntary Remediation Program (VRP) (Site Code 513208-00). A Site Soil Investigation conducted in October 2018 revealed elevated concentrations of metals (i.e., arsenic, cadmium, and lead) and select polycyclic aromatic hydrocarbons (PAHs) and polychlorinated biphenyls (PCBs). Soil remediation of impacted soils was performed in November and December 2018 and 2,259.99 tons of impacted soils were removed from the site. The NFA determination request is limited to 15 different media-specific areas located within the site boundaries where soil remediation and/or sampling was performed. Media included in the NFA request includes RCRA 8 Metals and select PAHs and PCBs.

The NFA Report is available online at <http://www.azdeq.gov/notices>, and at the ADEQ Records Center, 1110 W. Washington St., Phoenix, AZ (602) 771-4380, or (800) 234-5677, ext. 602-771- 4380; please call for hours of operation and to schedule an appointment.

PARTIES WISHING TO SUBMIT WRITTEN COMMENTS regarding the NFA request for the Former Automotive Salvage VRP Site may do so to ADEQ, Attention: Joey Pace, Voluntary Remediation Program, 1110 W. Washington St., Phoenix, AZ 85007 or Pace.Joey@azdeq.gov; or Attention: Derek Koller, Terracon Consultants, Inc., 355 South Euclid, Suite 107, Tucson, AZ 85719 or derek.koller@terracon.com and reference [this listing](#). Comments must be postmarked or received by ADEQ or Terracon Consultants, Inc. by **[Insert Comment Deadline Day and Date]**.

ADEQ will take reasonable measures to provide access to department services to individuals with limited ability to speak, write, or understand English and/or to those with disabilities. Requests for language interpretation services or for disability accommodations must be made at least 48 hours in advance by contacting: 7-1-1 for TDD; (602) 771-2215 for Disability Accessibility; or Ian Bingham, Title VI Nondiscrimination Coordinator at (602) 771-4322 or idb@azdeq.gov.

ADEQ tomará medidas razonables para proveer acceso a los servicios del departamento para personas con capacidad limitada para hablar, escribir o entender Inglés y / o para las personas con discapacidad. Las solicitudes de servicios de interpretación del lenguaje o de alojamiento de discapacidad deben hacerse por lo menos 48 horas de antelación poniéndose en contacto con Ian Bingham, Title VI Nondiscrimination Coordinator al (602) 771-4322 o idb@azdeq.gov.

Dated this **[Insert Comment Deadline Day and Date]**.

END OF DOCUMENT